

**SEMINOLE COUNTY GOVERNMENT
AGENDA MEMORANDUM**

SUBJECT: Substantial Amendment to the 2008-2009 One-Year Action Plan to add the Homelessness Prevention and Rapid Re-Housing Program (HPRP)

DEPARTMENT: Community Services

DIVISION: Community Assistance

AUTHORIZED BY: Michele Saunders

CONTACT: Buddy Balagia

EXT: 2389

MOTION/RECOMMENDATION:

Approve the attached Substantial Amendment to the 2008-2009 One-Year Action Plan, which allocates funding under the new Homelessness Prevention and Rapid Re-Housing Program (HPRP), for submittal to the U.S. Department of Housing and Urban Development (HUD) by May 18, 2009.

County-wide

Ricardo Soto-Lopez

BACKGROUND:

As part of the American Reinvestment and Recovery Act of 2009 (a/k/a the "Stimulus Act"), Congress authorized the appropriation of \$1.5 billion in HPRP funding, of which \$991,180 is allocated to Seminole County. Eligible activities include, but are not limited to:

- Short- and medium-term rental assistance•
- Case management•
- Moving expenses•
- Housing relocation and stabilization•
- Administrative costs.

Community Assistance Division staff plan to use some of the funds in-house for short- and medium-term rental assistance and case management, and a Request for Proposals (RFP) will be issued to contract with one or more agencies to provide medium-term rental assistance and case management. The target population is homeless individuals and those at risk of becoming homeless. Case management will be used to work toward self-sufficiency within 18 months.

Sixty percent (60%) of the HPRP funding must be spent within two (2) years of the effective grant agreement with HUD, and all funds must be spent within three (3) years. As required, the Substantial Amendment was posted for public comment for twelve (12) days on the County's web site and in the Orlando Sentinel. A Public Hearing was held on April 15, 2009 to solicit further comment and input. Only one (1) comment was received, as noted in the Amendment.

STAFF RECOMMENDATION:

Staff recommends that the Board approve the attached Substantial Amendment to the 2008-2009 One-Year Action Plan, which allocates funding under the new Homelessness Prevention and Rapid Re-Housing Program (HPRP), for submittal to the U.S. Department of Housing and Urban Development (HUD) by May 18, 2009.

ATTACHMENTS:

1. Substantial Amendment

Additionally Reviewed By:

- ☒ County Attorney Review (Susan Dietrich)
- ☒ Grant Review (Jennifer Bero, Lisa Spriggs)



SF 424

The SF 424 is part of the CPMP Annual Action Plan. SF 424 form fields are included in this document. Grantee information is linked from the 1CPMP.xls document of the CPMP tool.

SF 424

Complete the fillable fields (blue cells) in the table below. The other items are pre-filled with values from the Grantee Information Worksheet.

Date Submitted 5/16/2009	Applicant Identifier	Type of Submission	
Date Received by state	State Identifier	Application	Pre-application
Date Received by HUD	Federal Identifier	<input type="checkbox"/> Construction	<input type="checkbox"/> Construction
		<input checked="" type="checkbox"/> Non Construction	<input type="checkbox"/> Non Construction
Applicant Information			
Seminole County, Florida		UOG Code: FL129117	
1101 East First Street		Organizational DUNS: 67834358	
		Organizational Unit: Seminole County	
Sanford	Florida	Department: Community Services	
32771	U.S.A.	Division: Community Assistance	
Employer Identification Number (EIN):		County: Seminole	
59-6000856		Program Year Start Date (MM/DD): 1/15/2008	
Applicant Type:		Specify Other Type if necessary:	
Local Government: County		Specify Other Type	
Program Funding		U.S. Department of Housing and Urban Development	
Catalogue of Federal Domestic Assistance Numbers; Descriptive Title of Applicant Project(s); Areas Affected by Project(s) (cities, Counties, localities etc.); Estimated Funding			
Homelessness Prevention and Rapid Re-Housing Program (HPRP)		14.257 Entitlement Grant	
HPRP Project Titles: Financial Assistance, Housing Relocation and Stabilization Services, Data Collection and Evaluation, and Administration		Description of Areas Affected by HPRP Project(s): Seminole County	
\$HPRP Grant Amount: \$991,180.00	\$Additional HUD Grant(s) Leveraged	Describe	
\$Additional Federal Funds Leveraged: \$0		\$Additional State Funds Leveraged: \$0	
\$Locally Leveraged Funds: \$0		\$Grantee Funds Leveraged: \$0	
\$Anticipated Program Income: \$0		Other (Describe)	
Total Funds Leveraged for HPRP-based Project(s): \$0			
Congressional Districts of:		Is application subject to review by state Executive Order 12372 Process?	
Applicant Districts: 4, 5	Project Districts: 4,5		
Is the applicant delinquent on any federal debt? If "Yes" please include an additional document		<input checked="" type="checkbox"/> Yes	This application was made available to the state EO 12372 process for review on DATE

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explaining the situation.		<input type="checkbox"/> No	Program is not covered by EO 12372
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A	Program has not been selected by the state for review

Person to be contacted regarding this application		
First Name: Shirley	Middle Initial:	Last Name: Davis-Boyce
Title: Division Manager	Phone: 407-665-2363	Fax: 407-665-2358
eMail: sboyce@seminolecountyfl.gov	Grantee Website: www.seminolecountyfl.gov	Other Contact: Leo Luttig, 407-665-2393
Signature of Authorized Representative		Date Signed
Bob Dallari, Chairman		

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**Substantial Amendment to the Consolidated Plan 2008 Action Plan for the
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Grantees eligible to receive funds under the Homelessness Prevention and Rapid Re-Housing Program (HPRP) are required to complete a substantial amendment to their Consolidated Plan 2008 Action Plan. This form sets forth the required format for this substantial amendment. A completed form is due to HUD within 60 days of the publication of the HUD HPRP notice.

To aid grantees in meeting this submission deadline, the HPRP Notice reduces the requirement for a 30-day public comment period to no less than 12 calendar days for this substantial amendment. With this exception, HPRP grantees are required to follow their Consolidated Plan's citizen participation process, including consultation with the Continuum of Care (CoC) in the appropriate jurisdiction(s). Grantees are also required to coordinate HPRP activities with the CoC's strategies for homeless prevention and ending homelessness. To maximize transparency, HUD strongly recommends that each grantee post its substantial amendment materials on the grantee's official website as the materials are developed.

A complete submission contains the following three documents:

- 1) A signed and dated SF-424,
- 2) A completed form HUD-40119 (this form), and
- 3) Signed and dated General Consolidated Plan and HPRP certifications.

For additional information regarding the HPRP program, visit the HUD Homelessness Resource Exchange (www.hudhre.info). This site will be regularly updated to include HPRP resources developed by HUD and its technical assistance providers.

The information collection requirements contained in this application have been submitted to the Office of Management and Budget (OMB) for review under the Paperwork Reduction Act of 1995 (44 U.S.C. 3501-3520). This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid OMB control number.

Information is submitted in accordance with the regulatory authority contained in each program rule. The information will be used to rate applications, determine eligibility, and establish grant amounts.

Public reporting burden for this collection of information is estimated to be 16 hours, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This information is required to obtain benefits. To the extent that any information collected is of a confidential nature, there will be compliance with Privacy Act requirements. However, the substantial amendment to the Consolidated Plan 2008 Action Plan does not request the submission of such information.

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

**Substantial Amendment to the Consolidated Plan 2008 Action Plan for the
Homelessness Prevention and Rapid Re-Housing Program (HPRP)**

A. General Information

Grantee Name	Seminole County, Florida
Name of Entity or Department Administering Funds	Seminole County Community Services Department, Community Assistance Division
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Shirley Davis-Boyce
Title	Community Assistance Division Manager
Address Line 1	534 W. Lake Mary Blvd.
Address Line 2	
City, State, Zip Code	Sanford, FL 32773
Telephone	407-665-2363
Fax	407-665-2358
Email Address	sboyce@seminolecountyfl.gov
Authorized Official (if different from Contact Person)	
Title	
Address Line 1	
Address Line 2	
City, State, Zip Code	
Telephone	
Fax	
Email Address	
Web Address where this Form is Posted	www.seminolecountyfl.gov

Amount Grantee is Eligible to Receive*	\$ 991,180.00
Amount Grantee is Requesting	\$ 991,180.00

*Amounts are available at <http://www.hud.gov/recovery/homelesspreventrecov.xls>

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B. Citizen Participation and Public Comment

1. Briefly describe how the grantee followed its citizen participation plan regarding this proposed substantial amendment (limit 250 words).

Response: The proposed action plan amendment was posted on the County's web site under the "Announcements" section for a period of 12 days (April 6th through April 17th). A display ad was placed in the Orlando Sentinel on April 5, 2009. A public hearing will be held on April 15, 2009 to solicit public comments on the planned HPRP activities.

2. Provide the appropriate response regarding this substantial amendment by checking one of the following options:

- ☐ Grantee did not receive public comments.
- ☒ Grantee received and accepted all public comments.
- ☐ Grantee received public comments and did not accept one or more of the comments.

3. Provide a summary of the public comments regarding this substantial amendment. Include a summary of any comments or views not accepted and the reasons for non-acceptance.

Response: One commenter suggested that the out-sourced funds be awarded to the United Way Heart of Florida, for distribution to lower tier subrecipient agencies. The United Way would be Seminole County's designated steward of HPRP funds, and would exercise all data collection and file maintenance, to avoid duplication.

C. Distribution and Administration of Funds

Reminder: The HPRP grant will be made by means of a grant agreement executed by HUD and the grantee. The three-year deadline to expend funds begins when HUD signs the grant agreement. Grantees should ensure that sufficient planning is in place to begin to expend funds shortly after grant agreement.

1. Check the process(es) that the grantee plans to use to select subgrantees. Note that a subgrantee is defined as the organization to which the grantee provides HPRP funds.

- ☒ Competitive Process
- ☐ Formula Allocation
- ☐ Other (Specify: _____)

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2. Briefly describe the process(es) indicated in question 1 above (limit 250 words).

Response: Approximately 39% (\$382,000) of the HPRP award is being set aside for possible award to subgrantees. A Request for Proposals (RFP) will be solicited from local social service agencies that serve target populations similar to those outlined in the HPRP Notice. All proposals received are reviewed by a Department Director appointed team. Proposals will be rated using the following criteria: qualifications and experience (0-15 points); similar project experience (0-10 points); approach to work (0-50 points); and financial capacity and qualifications, to include proposed budget with justifications and service delivery and administrative oversight fees (0-25 points).

Three agencies have already made inquiries concerning the HPRP funding.

3. Briefly describe the process the grantee plans to use, once HUD signs the grant agreement, to allocate funds available to subgrantees by September 30, 2009, as required by the HPRP Notice (limit 250 words).

Response: The allocation of grant funds will be based on each participating social service agency's current case management capacity and their ability to manage efficiently and effectively the increased workload.

In an effort to put the funds to use as rapidly as possible, sixty-one (61) percent (\$609,180) of the grant funds will be allocated to the County's Community Assistance Division (Division) for disbursement for homelessness prevention and rapid re-housing financial assistance and housing relocation and stabilization services. Five case managers and two support staff, along with a case manager supervisor and program manager (funded by a combination of local general revenue and state/federal grant funds) will serve at a minimum 100 individuals/families through the process. The Division is currently providing short-term rental and utility assistance along with medium-term rental assistance under a Community Services Block Grant (CSBG) funded self-sufficiency program. Most of the HOME Program Tenant Based Rental Assistance (TBRA) clients will transition to Division case managers effective June 30, 2009. Data collection and evaluation, along with program administrative costs will also be covered by this allocation.

The remaining thirty-nine (39) percent (\$382,000) of the grant funds will be allocated to the social service agencies selected via the RFP process outlined in paragraph C.2. Each participating agency will be allocated this funding for financial assistance and housing relocation and stabilization services for each homeless family with children they commit to sponsor. At least 20 individuals/families will be assisted by these agencies. Any allocated funds that are no longer required to stabilize an individual/family's housing will be reallocated to other homeless individuals/families in search of housing stability.

Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)

4. Describe the grantee's plan for ensuring the effective and timely use of HPRP grant funds on eligible activities, as outlined in the HPRP Notice. Include a description of how the grantee plans to oversee and monitor the administration and use of its own HPRP funds, as well as those used by its subgrantees (limit 500 words).

Response: Expenditure timeliness spreadsheets, similar to those used with our other Federal/State grants, will be used to ensure the effective and timely use of HPRP grant funds. Expenditure timeliness comparisons are discussed at each month's Program Manager's meeting and is reported in the Community Services Department Monthly Financial Status Report.

Subgrantee agreements will involve a cash advance of up to two months worth of estimated expenditures, with monthly reimbursement requests for actual expenses. Expenditure milestones will be included in all HPRP subgrantee agreements, as they are with most of our current subgrantee agreements. Any subgrantee that appears to be in jeopardy of missing an expenditure milestone will receive technical assistance to develop plans to get their programs on track to meet their expenditure goals. Subgrantees that fail to meet their expenditure goals within three months of their technical assistance visit will have their subgrantee agreement terminated and all unobligated allocated funds returned to the County's Community Assistance Division for use or reallocation to other subgrantees.

It is not anticipated that there will be any problems in the timely expenditure of the HPRP funds. Each week the County receives at a minimum 50 inquiries concerning rent and/or utility assistance. Additionally, a local social service agency umbrella group has identified numerous homeless families with minor children. The demand for HPRP services within the County is present and a case management infrastructure is in place to handle the expected caseload increase in homelessness prevention activity and the initial group of rapid re-housing applicants are identified.

The effective use of HPRP grant funds on eligible activities will be monitored by the required submission of individual client case management summaries with each monthly expense reimbursement request. Any individual that is not making satisfactory progress on the case plan could be terminated from the program.

D. Collaboration

1. Briefly describe how the grantee plans to collaborate with the local agencies that can serve similar target populations, which received funds under the American Recovery and Reinvestment Act of 2009 from other Federal agencies, including the U.S. Departments of Education, Health and Human Services, Homeland Security, and Labor (limit 250 words).

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Response: Each of the social service agencies within the County's COC umbrella network and mainstream resources will be designated to provide a specific service geared to the agency's staff expertise and capacity. Most agencies within the COC umbrella network and mainstream resources receive a combination of Federal, State, or local grants, in addition to private sector and individual contributions. The County currently collaborates with most of the local agencies that will be receiving funding under the ARRA, by providing local general revenue grants. The County will take into consideration ARRA funds provided to these organizations when negotiating the terms, conditions, and targeted groups of the FY2009-10 funding agreements. Every effort will be made to tie some part of the local ARRA funds received to the HPRP program participants.

Additionally, the County will be designating a great majority of the subsidized rental units that are acquired and rehabilitated under the Neighborhood Stabilization Program (NSP) to house participants of the HPRP. NSP subsidies are designed to produce inordinately low rents, thus easing the eventual transition from HPRP assistance to self-sufficiency.

2. Briefly describe how the grantee plans to collaborate with appropriate Continuum(s) of Care and mainstream resources regarding HPRP activities (limit 250 words).

Response: The relationships established under the HPRP process will strengthen the ability for case managers from different agencies to collaborate and coordinate services. Each HPRP client will have a comprehensive case plan developed with their case manager to assist in accomplishing goals outlined in individual plans while providing supported services; case coordination with other service providers, and collaboration with vendors to overcome barriers addressed in the case plan. In addition, case managers will act as the liaison on behalf of the participant by advocating and empowering them to enhance their skills towards self-sufficiency. This collaboration will result in less duplicative services and save organization resources.

The County's Community Assistance Division has a long history of providing local and state/federal funded financial assistance and case management services to low income populations. The Division's case management staff has multiple years of public/private experience in serving low-income populations and has daily contact with local social service agencies in their pursuit of providing a full range of services to each of their clients. Conversely, Division staff receives inquiries/referrals from other local social service agencies in their attempt to provide a full range of services to their clients. Any specific service provider required by a HPRP client's case plan that is not currently participating in the County's social service agency collaboration efforts will be included.

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3. Briefly describe how HPRP grant funds for financial assistance and housing relocation/stabilization services will be used in a manner that is consistent with the grantee's Consolidated Plan (limit 250 words).

Response: The Continuum of Care (COC) homeless priorities outlined in the County's Consolidated Plan are providing transitional housing for families with children, especially victims of spousal abuse; and ending chronic homelessness. The two strategies adopted to address these priorities are expanding the supply of permanent supportive housing and increase access to income supports.

The County's specific homeless objectives as identified in the Consolidated Plan for FY2005 through FY2009 are:

1. Provide funds for emergency shelter operations to benefit 1,000 homeless.
2. Expand the number of shelter beds by 50.
3. Provide funds for homeless prevention for 500 families.
4. Expand the number of transitional/supportive housing beds by 100.

The HPRP activities to be funded involve short to medium term rental assistance and supportive housing relocation and stabilization services (mostly case management) to individuals/families to prevent homelessness. **(County homeless objective #3, also addresses the COC's priority of increasing access to income supports)**

HPRP funds will also be used to provide medium term rental assistance and supportive housing relocation and stabilization services (case management or support service not funded by Continuum of Care umbrella group) to families. **(This activity closely aligns with County homeless objective #4, also addresses the COC's priority of increasing access to income supports)**

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E. Estimated Budget Summary

HUD requires the grantee to complete the following table so that participants in the citizen participation process may see the grantee's preliminary estimated amounts for various HPRP activities. Enter the estimated budget amounts for each activity in the appropriate column and row. The grantee will be required to report actual amounts in subsequent reporting.

HPRP Estimated Budget Summary			
	Homelessness Prevention	Rapid Re- housing	Total Amount Budgeted
Financial Assistance ¹	\$288,000.00	\$488,000.00	\$776,000.00
Housing Relocation and Stabilization Services ²	\$77,280.00	\$88,720.00	\$166,000.00
Subtotal (add previous two rows)	\$365,280.00	\$576,720.00	\$942,000.00

Data Collection and Evaluation ³	\$ 3,000.00
Administration (up to 5% of allocation)	\$ 46,180.00
Total HPRP Amount Budgeted⁴	\$991,180.00

¹Financial assistance includes the following activities as detailed in the HPRP Notice: short-term rental assistance, medium-term rental assistance, security deposits, utility deposits, utility payments, moving cost assistance, and motel or hotel vouchers.

²Housing relocation and stabilization services include the following activities as detailed in the HPRP Notice: case management, outreach, housing search and placement, legal services, mediation, and credit repair.

³Data collection and evaluation includes costs associated with operating HUD-approved homeless management information systems for purposes of collecting unduplicated counts of homeless persons and analyzing patterns of use of HPRP funds.

⁴This amount must match the amount entered in the cell on the table in Section A titled "Amount Grantee is Requesting."

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F. Authorized Signature

By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete, and accurate to the best of my knowledge. I also provide the required assurances and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

Signature/Authorized Official

Date

Bob Dallari, Chairman
Title

**Substantial Amendment to the Consolidated Plan 2008 Action Plan for the
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**GENERAL CERTIFICATIONS FOR STATE OR LOCAL GOVERNMENT FOR
THE
HOMELESSNESS PREVENTION AND RAPID RE-HOUSING PROGRAM
(HPRP)**

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the state, territory, or local government certifies that:

Affirmatively Further Fair Housing -- The state, territory, or local government will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction or state, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Drug-Free Workplace --It will or will continue to provide a drug-free workplace by:

- 1 Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about:
 - (a) The dangers of drug abuse in the workplace;
 - (b) The grantee's policy of maintaining a drug-free workplace;
 - (c) Any available drug counseling, rehabilitation, and employee assistance programs; and
 - (d) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
- 3 Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will -
 - (a) Abide by the terms of the statement; and
 - (b) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
- 2 Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted -
 - (a) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

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(b) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, state, or local health, law enforcement, or other appropriate agency;

3 Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

Anti-Lobbying --To the best of the state, territory, or local government's knowledge and belief:

1 No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;

2 If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and

3 It will require that the language of paragraphs 1 and 2 of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Local Government, State, or Territory --The submission of the consolidated plan is authorized under state law and local law (as applicable) and the jurisdiction or state possesses the legal authority to carry out the programs under the consolidated plan for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with Plan -- The housing activities to be undertaken with HPRP funds are consistent with the strategic plan.

Section 3 --It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

Signature/Authorized Official

Date

Chairman, Board of County Commissioners
Title

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APPENDIX TO CERTIFICATIONS

**INSTRUCTIONS CONCERNING LOBBYING AND DRUG-FREE WORKPLACE
REQUIREMENTS:**

A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

B. Drug-Free Workplace Certification

1 By signing and/or submitting this application or grant agreement, the grantee is providing the certification.

2 The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.

3 Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.

4 Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).

5 If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph three).

6 The Grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance:

County Services Building
1101 E. First Street, Sanford, FL 32771

Reflections Plaza
534 W. Lake Mary Boulevard, Sanford, FL 32773

Check ____ if there are workplaces on file that are not identified here.

The certification with regard to the drug-free workplace is required by 24 CFR part 24, subpart F.

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7. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:
"Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);

"Conviction" means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

"Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

"Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All "direct charge" employees; (ii) all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and (iii) temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

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**Homelessness Prevention and Rapid Re-Housing Program (HPRP)
Certifications**

The HPRP Grantee certifies that:

Consolidated Plan – It is following a current HUD-approved Consolidated Plan or CHAS.

Consistency with Plan – The housing activities to be undertaken with HPRP funds are consistent with the strategic plan.

Confidentiality – It will develop and implement procedures to ensure:

(1) The confidentiality of records pertaining to any individual provided with assistance; and

(2) That the address or location of any assisted housing will not be made public, except to the extent that this prohibition contradicts a preexisting privacy policy of the grantee.

Discharge Policy – A certification that the State or jurisdiction has established a policy for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons.

HMIS – It will comply with HUD’s standards for participation in a local Homeless Management Information System and the collection and reporting of client-level information.

Signature/Authorized Official

Date

Chairman, Board of County Commissioners
Title